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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
 Washington, D.C. 20554

  
 OFFICE OF THE SECRETARY

In the Matter of )

Developing a Unified Intercarrier  
 Compensation Regime )

CC Docket No. 01-92/

**COMMENTS IN SUPPORT OF MOTION  
 FOR EXTENSION OF TIME**

Focal Communications Corporation, PacWest Telecom, Inc., RCN Telecom Services, Inc., and US LEC Corp. ("Commenters") file these comments in support of the motion filed by the United States Telecom Association ("USTA") for an extension of time until November 19, 2001 in which to file reply comments in the above-captioned proceeding.

In its motion, USTA states that the proposals in the *NPRM* to modify and/or replace current intercarrier compensation mechanisms have far-reaching implications for regulators, carriers, manufacturers, investors, employees, and consumers. USTA states that changing revenue flows associated with current intercarrier compensation structures would bring about a dramatic redistribution of traffic revenues and shifts of cost recovery responsibilities among carriers, consumers, services, and locations. In turn, this will result in widespread consequences, many of which may be major and unwanted dislocations due to the size and reach of the financial impact of the change, according to USTA.


USTA notes that approximately 90 parties have filed comments raising a myriad of complex issues, many of which will require expert economic review. USTA states that the current time frame for filing reply comments – October 5, 2001 – does not provide sufficient time to respond given the scope and importance of the issues presented.

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Commenters fully support USTA's evaluation of the dramatic changes that would be occasioned by modification or elimination of current intercarrier compensation mechanisms. For all the reasons pointed out in Commenters' initial comments, CLECs are likely to experience a disproportionately negative impact from any movement toward bill-and-keep. In addition, the record is unusually complex. At the same time, the requested extension would not unduly delay the outcome of this proceeding.

Accordingly, Commenters support USTA's motion for extension of time and request that the Commission promptly grant it.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rindler', with a long horizontal flourish extending to the right.

Richard M. Rindler

Patrick J. Donovan

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